

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

)
) Chapter 11
)

) Case No. 22-11068 (JTD)
)

) (Jointly Administered)
)
)

**SUPPLEMENTAL DECLARATION OF ALEX VAN VOORHEES IN SUPPORT
OF APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
TO RETAIN AND EMPLOY YOUNG CONAWAY STARGATT & TAYLOR, LLP
AS CO-COUNSEL, EFFECTIVE AS OF DECEMBER 22, 2022**

Pursuant to 28 U.S.C. § 1746, I, Alex van Voorhees, solely in my capacity as the co-chair of the Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), hereby submit this supplemental declaration (this “Supplemental Declaration”) under penalty of perjury:

1. I am over the age of 21 and am competent in all respects to make this Supplemental Declaration. I make this Supplemental Declaration in further support of the *Application of the Official Committee of Unsecured Creditors to Retain and Employ Young Conaway Stargatt & Taylor, LLP as Co-Counsel, Effective as of December 22, 2022* (the “Application”) [Docket No. 522].² Except as otherwise noted, I have made the statements herein based on my personal knowledge, information and belief, and in reliance on statements made to me by the Committee and its professionals.

¹ The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

² Capitalized terms used but not otherwise defined herein have the meanings given to them in the Application.

2. As set forth in my initial declaration in support of Young Conaway's retention (the "Initial Declaration"), which was attached to the Application as Exhibit C, the Committee selected Young Conaway to serve as co-counsel based on, among other things, Young Conaway's extensive knowledge, expertise, and experience in the field of debtors' and creditors' rights and business reorganizations under chapter 11 of the Bankruptcy Code. Prior to selecting Young Conaway, the Committee interviewed one other firm to serve as co-counsel to the Committee with Paul Hastings.

3. The Committee did not request that Young Conaway discount its standard rates. As set forth in my Initial Declaration, Young Conaway informed the Committee that its current hourly rates are the Firm's standard hourly rates for work of this nature. The Committee understands that such rates are comparable to the rates of firms similar to Young Conaway and do not vary as a function of whether the services performed relate to a bankruptcy engagement or a non-bankruptcy engagement. Throughout these Chapter 11 Cases, the Committee will supervise the fees and expenses incurred by Young Conaway to manage costs.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge and belief.

Executed this 8th day of February, 2023.

GGC International, Ltd., solely in its capacity as
Co-Chair of the Official Committee of Unsecured
Creditors of FTX Trading, Ltd., *et al.*

By: /s/ Alex van Voorhees

Name: Alex van Voorhees

Title: Authorized Signatory